

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy Case No. 19-20959 GLT
	:	
Glen H. Green and Esther L. Green,	:	Chapter 13
	:	
Debtors,	:	Document No.
	:	
The Money Source, Inc.,	:	Related to Document No. 136 and 137
	:	
Movant,	:	Hearing Date: Wednesday, February 8,
	:	2023 at 10:00 a.m.
vs.	:	
	:	
Glen H. Green and Esther L. Green,	:	
	:	
Respondents.	:	

**DEBTORS' RESPONSE TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

Debtors, Glen H. Green and Esther L. Green, by their Attorneys Zebley Mehalov & White, and Daniel R. White, Esquire respond to the Motion for Relief from the Automatic Stay as follows:

1-6,9,10,13. Admitted.
7-8,11-12,14-15. Denied. Debtors demand strict proof of the averments of paragraphs 7-8,11-12,14-15.

DEBTORS' DEFENSES

1. Debtors have an interim confirmed Chapter 13 plan dated March 1, 2022, which pays Movant its regular monthly payment and cures prepetition arrears.
2. Debtors valued their residence at \$225,000.00 in their Schedule A subject to Movant's mortgage claim in the current amount of \$120,062.69 according to paragraph 6 of Movant's Motion.
3. Debtors are currently behind in payments due to medical issues and storm damage to their home. However, they made a double payment in early January and intend to bring all payments current before the end of February 2023.
4. Movant has received distributions from the Trustee of over \$29,000.00 since the conformation of the Chapter 13 Plan. Debtors' monthly payment plus the Trustee

distributions provide adequate protection to Movant.

5. Movant does not dispute the current market value of the residence as set forth in Debtors Schedule A as indicated in paragraph 10 of the Motion for Relief.
6. Debtors assert that the value of the residence significantly exceeds the amount of the debt owed to Movant, thus providing adequate protection.
7. Under these circumstances, Movant is provided adequate protection and is not entitled to relief from stay or conditional relief from stay as requested.

WHEREFORE, The Debtors, Glen H. Green and Esther L. Green, respectfully request this Court to Deny the Motion for Relief from the Automatic Stay and Order such further relief that this Court deems appropriate.

Dated: January 11, 2023

ZEBLEY MEHALOV & WHITE, P.C.
By

/s/ Daniel R. White

Daniel R. White
Pa. ID No. 78718
P.O. Box 2123
18 Mill Street Square
Uniontown, PA 15401
Telephone: 724-439-9200
Email: dwhite@Zeblaw.com
Attorney for Debtors